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7 Attorneys for Chapter 7 Trustee,
ARTURO M. CISNEROS

8 UNITED STATES BANKRUPTCY COURT
9 CENTRAL DISTRICT OF CALIFORNIA – RIVERSIDE DIVISION
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11 In re
12 SHAMICKA LAWRENCE,
13 Debtor.
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Case No. 6:23-bk-15163-WJ

Chapter 7

DECLARATION OF JONATHN
ALARCON AND CINDY HERRERA IN
SUPPORT OF MOTION FOR ORDER:
AUTHORIZING SALE OF REAL
PROPERTY LOCATED AT 11364
ESTATES COURT, RIVERSIDE,
CALIFORNIA 92503 (A) OUTSIDE THE
ORDINARY COURSE OF BUSINESS;
(B) FREE AND CLEAR OF LIENS;
(C) SUBJECT TO OVERBIDS; AND
(D) FOR DETERMINATION OF GOOD
FAITH PURCHASER UNDER § 363(M)

Date: May 21, 2024
Time: 1:00 p.m.
Ctrm: 304
Address: 3420 Twelfth Street
Riverside, Ca 92501

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1 TO THE HONORABLE WAYNE JOHNSON, UNITED STATES BANKRUPTCY JUDGE, THE
2 OFFICE OF THE UNITED STATES TRUSTEE, DEBTOR, AND ALL INTERESTED PARTIES:

3 Arturo M. Cisneros (“Trustee”), solely in his capacity as the chapter 7 trustee of Shamicka
4 Lawrence (“Debtor”), submits the attached declaration of buyers, Jonathan Alarcon and Cindy
5 Herrera, in support of the Trustee’s motion for authority to sell real property commonly known
6 11364 Estates Court, Riverside, California 92503 (“Property”), filed on May 1, 2024, as Dk. No. 73
7 (“Motion”).

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9 Dated: May 1, 2024

MARSHACK HAYS WOOD LLP

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11 By: /s/ Tinho Mang
12 D. EDWARD HAYS
13 TINHO MANG
14 Attorneys for Chapter 7 Trustee,
15 ARTURO M. CISNEROS
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Declaration of Jonathan Alarcon and Cindy Herrera

I, JONATHAN ALARCON and CINDY HERRERA, declare as follows, for each of us individually:

1. I am an individual over 18 years of age and competent to make this Declaration.

2. If called upon to do so, I could and would competently testify as to the facts set forth in this Declaration. The facts set forth below are true of my personal knowledge.

3. We have collectively made an offer for the purchase of the property located at 11364 Estates Court, Riverside, CA 92503 ("Property"), at the initial price of \$1,700,000. This price was obtained after multiple rounds of negotiations with the seller, Arturo M. Cisneros, the Chapter 7 trustee ("Trustee"). We also made the initial deposit of \$52,500.

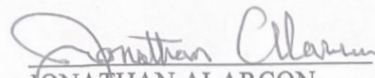
4. I became aware of the Property through the public listing through my real estate agent. I toured the Property at an open house on March 23, 2024, and subsequently made an offer to purchase the Property.

5. To the best of my knowledge, I do not have any connection or relationship with the Trustee, the Debtor Shamicka Lawrence, Debtor's family members, the Lawrence Children's Trust u/t/a May 6, 2014, or any creditor of the Estate, or any of their attorneys or professionals, including but not limited to Trustee's broker Brian Thompson. I also have no connection with the presiding judge in this case and no connection with any person in the Office of the United States Trustee.

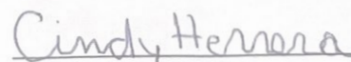
6. I did not receive any special treatment or consideration and have negotiated the purchase on an arms-length basis through my real estate agent.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 05-01, 2024


JONATHAN ALARCON

Dated: 5/11, 2024


CINDY HERRERA

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **DECLARATION OF JONATHN ALARCON AND CINDY HERRERA IN SUPPORT OF MOTION FOR ORDER: AUTHORIZING SALE OF REAL PROPERTY LOCATED AT 11364 ESTATES COURT, RIVERSIDE, CALIFORNIA 92503 (A) OUTSIDE THE ORDINARY COURSE OF BUSINESS; (B) FREE AND CLEAR OF LIENS; (C) SUBJECT TO OVERBIDS; AND (D) FOR DETERMINATION OF GOOD FAITH PURCHASER UNDER § 363(M)** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **May 1, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On **May 1, 2024**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **May 1, 2024**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

VIA OVERNIGHT MAIL

HONORABLE WAYNE JOHNSON
UNITED STATES BANKRUPTCY COURT
3420 Twelfth Street, Suite 384 / Courtroom 304
Riverside, CA 92501-3819

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

May 1, 2024
Date

Chanel Mendoza
Printed Name

/s/ Chanel Mendoza
Signature

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

- **TRUSTEE: Arturo Cisneros (TR)** amctrustee@mclaw.org, acisneros@iq7technology.com;ecf.alert+Cisneros@titlexi.com
- **INTERESTED PARTY COURTESY NEF: Alan W Forsley** alan.forsley@flpllp.com, awf@fkllawfirm.com,awf@fl-lawyers.net,addy@flpllp.com
- **ATTORNEY FOR LAWRENCE CHILDREN'S TRUST UTA MAY 6, 2014: Thomas M Geher** tmg@jmbm.com, bt@jmbm.com;tmg@ecf.courtdrive.com
- **ATTORNEY FOR INTERESTED PARTY MESSAGE ENFY FRANCHISING: Eric D Goldberg** eric.goldberg@dlapiper.com, eric-goldberg-1103@ecf.pacerpro.com
- **ATTORNEY FOR TRUSTEE: D Edward Hays** ehays@marshackhays.com, ehays@ecf.courtdrive.com;alinares@ecf.courtdrive.com;cmendoza@marshackhays.com;cmendoza@ecf.courtdrive.com
- **ATTORNEY FOR DEBTOR: Marc A Lieberman** marc.lieberman@flpllp.com, safa.saleem@flpllp.com,addy@flpllp.com
- **ATTORNEY FOR TRUSTEE: Tinho Mang** tmang@marshackhays.com, tmang@ecf.courtdrive.com;alinares@ecf.courtdrive.com;cmendoza@ecf.courtdrive.com
- **U.S. TRUSTEE: United States Trustee (RS)** ustpreion16.rs.ecf@usdoj.gov

2. SERVED BY UNITED STATES MAIL: (CONTINUED)

DEBTOR

SHAMICKA LAWRENCE
11364 ESTATES COURT
RIVERSIDE, CA 92503-0639

INTERESTED PARTY

ALL OCCUPANTS AND/OR
TENANTS OCCUPYING THE REAL
PROPERTY LOCATED AT:
11364 ESTATES COURT
RIVERSIDE, CA 92503-0639

INTERESTED PARTY

ROBERT LAWRENCE, TRUSTEE
LAWRENCE CHILDREN'S TRUST
U/D/T MAY 6, 2014
C/O NANCY BOXWELL, ESQ.
GANG TYRE RAMER BROWN &
PASSMAN
132 S RODEO DR, BEVERLY
HILLS, CA 90212

SECURED CREDITOR

RIVERSIDE COUNTY TAX
COLLECTOR
ATTN: MATTHEW JENNINGS
TREASURER-TAX COLLECTOR
4080 LEMON ST, 4TH FLOOR
RIVERSIDE, CA 92501-3609